



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

May 24, 2002

CERTIFIED MAIL #7000 1530 0005 5348 6377

Mr. Ed White  
Operations Manager  
Lamb Weston, Inc.  
P.O. Box 128  
Twin Falls, ID 83301

RECEIVED

MAY 28 2002

DEPT. OF ENVIRONMENTAL QUALITY  
TECHNICAL SERVICES OFFICE

RE: AIRS Facility No. 083-00062, Lamb Weston, Inc., Twin Falls, Idaho  
Final Tier II Operating Permit

Dear Mr. White:

The Department of Environmental Quality (Department) is issuing Tier II operating permit No. 083-00062 for the Lamb Weston, Inc. facility located in Twin Falls, in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. This Tier II permit is effective immediately and supersedes your previous permit issued on October 2000. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Mr. Stephen VanZandt of the Twin Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends attendance of your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Mike Simon at (208) 373-0502 or [msimon@deq.state.id.us](mailto:msimon@deq.state.id.us).

Sincerely,

*Marjorie Mary Emerson*  
FOR  
Katherine B. Kelly  
Administrator  
Air Quality Division

KK/SEC/tk Project No. T2-01043

G:\AIR PERMITS\T2\LAMB WESTON TWIN FALLS\FINAL PREP\T2 FINAL PERMIT LTR.DOC

Enclosure

cc: Stephen VanZandt, Twin Falls Regional Office  
Sherry Davis, Technical Services

Joan Lechtenberg, Air Quality Division  
Laurie Kral, EPA Region 10

May 14, 2002

**STATE OF IDAHO  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
RESPONSE TO PUBLIC COMMENTS  
ON DRAFT TIER II AIR QUALITY PERMIT  
FOR LAMB-WESTON INC., TWIN FALLS, IDAHO**

**Introduction**

As required by IDAPA 58.01.01.404.01 (*Rules for the Control of Air Pollution in Idaho*), the Idaho Department of Environmental Quality (DEQ) provided for public comment, including offering an opportunity for a hearing, a Tier II operating permit proposed for the Lamb-Weston, Inc. facility located in Twin Falls, Idaho. Public comment packages, which included the application materials, and proposed permit and technical memorandum, were made available for public review at the DEQ's Boise Regional Office, and DEQ's State Office in Boise. A copy of the proposed permit and technical memorandum was also posted on DEQ's Web site. The public comment period was provided from April 2, 2002 through May 1, 2002, with no public hearing requested. Those comments regarding the air quality aspects of the draft permit are provided below with DEQ's response immediately following.

**Public Comments and DEQ Responses**

The only comments received were from Lamb-Weston.

- **Comment:** Section 1.3 – Source description first line (line 4 fryers) should be Line 4 Fryer. Next line down, (Line 1 Dryers) should be Line 1 Dryer.
  - **Response:** Clarification changes made.
- **Comment:** Sections 2.2, 2.3, & 2.5 – Reference to IDAPA 58.01.01.405.07 should be removed. The latest version of IDAPA 59.01.01 does not have a section 405.07.
  - **Response:** This reference has been updated to read IDAPA 58.01.01.405.
- **Comment:** Section 2.9 - (dioxide) should be dioxide.
  - **Response:** Spelling correction made.
- **Comment:** Section 3.5 - Reference to (General Provision B), Should be General Provision 11.2.
  - **Response:** Reference correction made.
- **Comment:** Section 3.8, 3.9 & 4.4 – Reference to (General Provision B) should be General Provision 11.9.
  - **Response:** Reference correction made.
- **Comment:** Section 4 – There are two 4.1's
  - **Response:** Numbering correction made.
- **Comment:** Section 4.1 – Reference to the heat recovery units should be dropped since the Line 2 Dryer does not have heat recovery units.
  - **Response:** Clarification made.
- **Comment:** Section 5 – There are two 5.1's
  - **Response:** Numbering correction made.
- **Comment:** Section 5.8 - Reference to (Permit Condition 10.3.2) should be Permit Condition 5.7.
  - **Response:** Numbering correction made.
- **Comment:** Section 6 – There are two 6.1's
  - **Response:** Numbering correction made.



**Air Quality  
TIER II OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** 083-00062

**AQCR:** 063    **CLASS:** SM

**SIC:** 2099    **ZONE:** 11

**UTM COORDINATE (km):** 706.6, 4714.0

**1. PERMITTEE**

Lamb Weston, Inc.

**2. PROJECT**

Tier II Operating Permit

**3. MAILING ADDRESS**

856 Russet St.

**CITY**

Twin Falls

**STATE**

ID

**ZIP**

83301

**4. FACILITY CONTACT**

Dave Kubosumi

**TITLE**

Engineering Manager

**TELEPHONE**

(208) 733-5664

**5. RESPONSIBLE OFFICIAL**

Ed White

**TITLE**

Operations Manager

**TELEPHONE**

(208) 733-5664

**6. EXACT PLANT LOCATION**

42° 33 min 07 sec N, 114° 29 min 00 sec W

**COUNTY**

Twin Falls

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Production of Frozen Potato Products

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

*Margerie M. Kelly* for  
KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** MAY 24, 2002

**DATE EXPIRES:** MAY 24, 2007

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## LIST OF ACRONYMS

ACFM	Actual Cubic Feet Per Minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
dscf	Dry Standard Cubic Feet
EF	Emission Factor
EPA	United States Environmental Protection Agency
gpm	Gallons Per Minute
gr	Grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IC	Integrated Chip
IDAPA	Idaho Administrative Procedures Act
km	Kilometer
lb/hr	Pound Per Hour
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
O <sub>3</sub>	Ozone
OP	Operating Permit
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
PTC	Permit To Construct
PTE	Potential To Emit
SCC	Source Classification Code
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TSP	Total Suspended Particulates
T/yr	Tons Per Year
µm	Micrometers
VOC	Volatile Organic Compound

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 083-00062****Permittee:** Lamb Weston, Inc.**Date Issued:** MAY 24, 2002**Location:** Twin Falls, Idaho**Date Expires:** MAY 24, 2007**1. TIER II OPERATING PERMIT SCOPE****Purpose**

1.1 The primary purpose of this Tier II Operating Permit is to establish facility-wide requirements to limit emissions below Title V permitting thresholds and to protect National Ambient Air Quality Standards.

1.2 This Tier II permit supercedes the following permit:

- Tier II No. 083-00062, issued October 17, 2000.

**Regulated Sources**

1.3 Table 1.1 below lists all regulated emissions sources in this permit:

**Table 1.1 Regulated Source Summary**

Permit Section	Source Description	Emissions Control(s)
3	Line 1 Fryer, Line 2 Fryer, Line 4 Fryer, Special Products Fryer	Scrubber
4	Line 1 Dryers, Line 2 Dryer and Pre-Dryer, Line 4 Dryer, and Special Products Dryer	None
5	Boiler No. 1 (Combustion Engineering 16-A-15, 180 MMBtu/hr)	None
6	Boiler No. 2 (Murray-Trane MCF4-57, 72 MMBtu/hr) Boiler No. 3 (Cleaver Brooks D-52, 36 MMBtu/hr)	None
7	Heaters and Burners	None
8	Emergency Diesel Generators (100 kW and 230 kW)	None
9	Waste Gas Burner American Heating Company AHC-1500 19 MMBtu/hr	None

**Permittee:** Lamb Weston, Inc.

**Date Issued:** MAY 24, 2002

**Location:** Twin Falls, Idaho

**Date Expires:** MAY 24, 2007

## **2. FACILITY-WIDE CONDITIONS**

### ***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

- 2.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.405, 5/1/94]

- 2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.

[IDAPA 58.01.01.405, 5/1/94]

### ***Odors***

- 2.4 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 2.5 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.

[IDAPA 58.01.01.405, 5/1/94]

### ***Visible Emissions***

- 2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

- 2.7 The permittee shall conduct a monthly, facility-wide, visible emission walk around of potential sources of visible emissions, during daylight hours and under normal operating conditions. If any visible emissions are present from any point of emissions, the permittee shall take appropriate corrective action as expeditiously as practicable. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action, and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall keep records of the results of each monthly visible emission inspection.

Permittee: Lamb Weston, Inc.

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The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed); any corrective action taken in response to the visible emissions; and the date corrective action was taken. The most recent five years' compilation of data shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.405.01, 5/1/94]

### ***Excess Emissions***

- 2.8 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136]

### ***Fuel-Burning Operating Requirements***

- 2.9 The combined combustion of all fuels from all sources shall not cause oxides of nitrogen (NO<sub>x</sub>) or sulfur dioxide (SO<sub>2</sub>) to be emitted to the atmosphere in quantities greater than 99 tons per year (T/yr) for each pollutant for any consecutive 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

### ***Fuel Consumption Monitoring And Recording***

- 2.10 The permittee shall monitor and record the following parameters to verify compliance with the permit. A compilation of the most recent five years of records shall be kept onsite and shall be made available to the Department representatives upon request.
- 2.11 Calendar date and amount of natural gas burned, in cubic feet per month or therms per month, and cubic feet or therms per any consecutive 12-month period;
- 2.12 Calendar date and amount of diesel fuel burned, in gallons per month and gallons per any consecutive 12-month period;
- 2.13 Calendar date and amount of cooking oil burned, in gallons per month and gallons per any consecutive 12-month period.
- 2.14 Calendar date and amount of waste gas burned, in cubic feet per month and cubic feet per any consecutive 12-month period.

[IDAPA 58.01.01.405.01, 5/1/94]

### ***No<sub>x</sub> And So<sub>2</sub> Emission Calculations***

- 2.15 The permittee shall calculate the NO<sub>x</sub> and SO<sub>2</sub> emissions for the previous 12-month period to ensure NO<sub>x</sub> and SO<sub>2</sub> emissions do not exceed 99 tons per year. The records shall be submitted to the Department every six months, kept at the facility for the most recent five-year period, and shall be available to Department representatives upon request.
- 2.16 Nitrogen oxides calculations shall be made using the following table:



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**Table 2.1 Nitrogen Oxides Calculations**

Source	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler 1 Natural Gas	MMCF <sup>a</sup> x	83.73 lb/MMCF =	Lbs
Rest of Plant Natural Gas	MMCF x	100 lb/MMCF =	Lbs
Waste Gas	MMCF x	100 lb/MMCF =	Lbs
Total Diesel	Gallons x	20 lb/1000 gal =	Lbs
Total Vegetable Oil	Gallons x	25 lb/1000 gal =	Lbs
Total =			Lbs
			Tons

<sup>a</sup> Million cubic feet

2.17 Sulfur dioxide (SO<sub>2</sub>) calculations shall be made using the following table:

**Table 2.2 Sulfur Dioxide (SO<sub>2</sub>) Calculations**

Source	Fuel Usage (previous 12 months)	Emission Factor	Emissions
Boiler 1 Natural Gas	MMCF <sup>a</sup> x	0.6 lb/MMCF <sup>b</sup> =	Lbs
Rest of Plant Natural Gas	MMCF <sup>a</sup> x	0.6 lb/MMCF <sup>b</sup> =	Lbs
Waste Gas	MMCF <sup>a</sup> x	1015 lb/MMCF <sup>b</sup> =	Lbs
Total Diesel	Gallons x	7.1 lb/1000 gal =	Lbs
Total Vegetable Oil	Gallons x	0.11 lb/1000 gal =	Lbs
Total =			Lbs
			Tons

<sup>a</sup> Pounds per million cubic feet

[IDAPA 58.01.01.405.01, 5/1/94]

### Open Burning

2.18 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

### Test Method

2.19 If testing is required, the permittee shall use the following test methods described in Table 2.2 to measure the pollutant emissions:

**Table 3 Testing Requirements**

Pollutant	Test Method	Special Conditions
PM <sub>10</sub>	EPA Method 201.a.*	
PM	EPA Method 5*	
NO <sub>x</sub>	EPA Method 7*	
SO <sub>2</sub>	EPA Method 6*	
CO	EPA Method 10*	
VOC	EPA Method 25*	
Opacity	EPA Method 9*	If NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

\* Or Department-approved alternative in accordance with IDAPA 58.01.01.157

**Permittee:** Lamb Weston, Inc.  
**Location:** Twin Falls, Idaho

**Date Issued:** MAY 24, 2002  
**Date Expires:** MAY 24, 2007

### ***Performance Test Report***

- 2.20 In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to the Department within 30 days of test completion.

[IDAPA 58.01.01.157.04, 5/1/94]

### ***Reports and Certifications***

- 2.21 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Twin Falls Regional Office  
601 Pole Line Rd., Suite 2  
Twin Falls, ID 83301

[IDAPA 58.01.01.405.01, 5/1/94]

Permittee: Lamb Weston, Inc.  
 Location: Twin Falls, Idaho

Date Issued: MAY 24, 2002  
 Date Expires: MAY 24, 2007

### 3. LINE 1 FRYER, LINE 2 FRYER, LINE 4 FRYER AND SPECIAL PRODUCTS FRYER

#### 3.1 Process Description

If needed for the product a batter is applied to the potatoes, which are fried in one of the listed fryers. The fryer exhaust contains particulate matter from the potatoes, oil particles from the oil used in frying and VOC's from the frying process. The fryers exhaust exits through a water scrubber.

### ***Emissions Limits***

#### 3.2 Emissions Limits

Emissions from the line 1, line 2, line 4, and the special products fryers shall not exceed any limits listed in the appendices of this permit.

### ***Operating Requirements***

#### 3.3 Throughput Limit

The maximum throughput of finished potato product from the line 1, line 2, line 4 and special products fryers shall not exceed the following daily (tons per day) and annual (tons per previous 12 month period) limits:

Line 1 Fryer	590 tons/day	215,146 tons/previous 12-month period
Line 2 Fryer	544 tons/day	198,502 tons/previous 12-month period
Line 4 Fryer	770 tons/day	281,021 tons/previous 12-month period
Special Products Fryer	109 tons/day	39,683 tons/previous 12-month period

#### 3.4 Monitoring Equipment

The permittee shall calibrate, maintain, and operate in accordance with manufacturer specifications, the equipment which continuously measures the pressure differential across the scrubber and the scrubbing media flowrate to the air pollution control equipment.

#### 3.5 Operations and Maintenance Manual Requirements

The operations and maintenance (O&M) manual for the scrubber, which describes the procedures that will be followed to comply with General Provision 11.2 and the air pollution control device requirements contained in this permit, shall remain onsite at all times and shall be made available to Department representatives upon request.

#### 3.6 Pressure Drop Across scrubber

The pressure drop across the scrubber shall be maintained within the manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

#### 3.7 Scrubbing Media Flowrate

The scrubbing media flowrate to the air pollution control devices shall be maintained within manufacturer and O&M manual specifications. Documentation of the manufacturer and O&M manual operating scrubbing media specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

Permittee: Lamb Weston, Inc.

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Location: Twin Falls, Idaho

Date Expires: MAY 24, 2007

## ***Monitoring And Recordkeeping Requirements***

### **3.8 PM<sub>10</sub> Performance Tests**

The permittee shall conduct a performance test to measure PM<sub>10</sub> from the line 4 fryer stack on or before December 21, 2004, and at a minimum of once every five years thereafter. The permittee shall use the results of the PM<sub>10</sub> performance tests to establish a PM<sub>10</sub> emission factor which shall be used to estimate emissions from each fryer at the facility and determine compliance with the PM<sub>10</sub> emission limits specified in this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 11.9 of this permit, and the following requirements:

- Line 4 fryer shall be operated at normal production rates during the performance tests.
- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157,
- The pressure drop across the air pollution control equipment of the line 4 fryer shall be recorded during each performance test.
- The throughput of finished potato product from the line four fryer shall be recorded during each performance test in tons per hour in tons per hour (tons/hr).

### **3.9 VOC Performance Tests**

The permittee shall conduct a performance test to measure VOCs from the line 4 fryer stack on or before December 21, 2004, and at a minimum of once every five years thereafter. The permittee shall use the results of the VOC performance tests to establish a VOC emission factor which shall be used to estimate emissions from each fryer at the facility and determine compliance with the VOC emission limits specified in this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 11.9 of this permit, and the following requirements:

- Line 4 fryer shall be operated at normal production rates during the performance tests.
- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157.
- The throughput of finished potato product from the line four fryer shall be recorded during each performance test in tons per hour.

### **3.10 Throughput**

The permittee shall monitor and record, both daily and annually, the throughput of finished potato product from line 1, line 2, line 4, and the special products fryers to demonstrate compliance with this permit. Throughput shall be recorded as tons per day and tons per year. The respective throughput for each day may be determined using monthly throughput records. A compilation of the most recent five years of records shall be maintained onsite and shall be made available to Department representatives upon request.

**Permittee: Lamb Weston, Inc.****Date Issued: MAY 24, 2002****Location: Twin Falls, Idaho****Date Expires: MAY 24, 2007****3.11 Air Pollution Control Equipment**

The following parameters shall be monitored and recorded during operation as specified below. A compilation of the most recent five years of records shall be maintained onsite and shall be made available to Department representatives upon request.

- Pressure drop across the air pollution control device once daily.
- The scrubbing media flowrate to the air pollution device once daily.
- Maintenance on the air pollution control device and any modifications made to the operating specifications as performed on a daily basis.

Permittee: Lamb Weston, Inc.  
 Location: Twin Falls, Idaho

Date Issued: MAY 24, 2002  
 Date Expires: MAY 24, 2007

#### 4. LINE 1 DRYER, LINE 2 DRYER, LINE 4 DRYER AND SPECIAL PRODUCTS DRYER

##### 4.1 Process Description

Potatoes are cut, defects removed and the cut potatoes are graded and then blanched. Blanching is a hot water process which partially cooks the potatoes. Only steam is emitted from the blanchers. The potatoes are dried in one of the natural gas fired dryers. There are no emission control devices on the dryers. The emissions contain steam, particulate matter and combustion by products.

#### ***Emissions Limits***

##### 4.2 Emissions Limits

Emissions from the line 1, line 2, line 4, and the special products dryers shall not exceed any limits listed in the appendices of this permit.

#### ***Operating Requirements***

##### 4.3 Throughput Limit

The maximum throughput of finished potato product from the line 1, line 2, line 4 and special products dryers shall not exceed the following daily (tons per day) and annual (tons per previous 12 month period) limits:

Line 1 Dryer	590 tons/day	215,146 tons/previous 12-month period
Line 2 Dryer	544 tons/day	198,502 tons/previous 12-month period
Line 4 Dryer	770 tons/day	281,021 tons/previous 12-month period
Special Products Dryer	109 tons/day	39,683 tons/previous 12-month period

##### 4.4 Fuel Specification

The line 1 dryer, line 2 pre-dryer, line 2 dryer, line 4 dryer, and the special products dryer shall burn natural gas exclusively.

#### ***Monitoring And Recordkeeping Requirements***

##### 4.5 PM<sub>10</sub> Performance Tests

The permittee shall conduct a performance test to measure PM<sub>10</sub> from the line 4 dryer stack on or before December 21, 2004, and at a minimum of once every five years thereafter. The permittee shall determine one stack of the line 4 dryer stacks that has the worst-case PM<sub>10</sub> emissions for testing purposes. The permittee shall use the results of the PM<sub>10</sub> performance tests from the line 4 dryer stacks to establish a PM<sub>10</sub> emission factor which shall be used to estimate emissions from each dryer at the facility and determine compliance with the PM<sub>10</sub> emission limits specified in this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance with of this permit, shall be performed in accordance with IDAPA 58.01.01.157, General Provision 11.9 of this permit, and the following requirements:

[IDAPA 58.01.01.157]

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 083-00062**

**Permittee:** Lamb Weston, Inc.

**Date Issued:** MAY 24, 2002

**Location:** Twin Falls, Idaho

**Date Expires:** MAY 24, 2007

- Visible emissions shall be observed during each performance test run using methods specified in IDAPA 58.01.01.157.
- The throughput of finished potato product in tons/hr from line 4 dryer shall be recorded during each performance test.
- Line 4 fryer shall be operated at normal production rates during the performance tests.

**[IDAPA 58.01.01.157]**

**4.6** **Throughput**

The permittee shall monitor and record, both daily and annually, the throughput of finished potato product from the line 1 dryer, line 2 dryer and pre-dryer, line 4 dryer, and the special products dryer to demonstrate compliance with this permit. Throughput shall be recorded as tons/day and T/yr. The respective throughput for each day may be determined using monthly throughput records. Records of the most recent two-year period shall be maintained onsite and shall be made available to Department representatives upon request.

Permittee: Lamb Weston, Inc.

Date Issued: MAY 24, 2002

Location: Twin Falls, Idaho

Date Expires: MAY 24, 2007

**5. BOILER NO. 1 (COMBUSTION ENGINEERING)****5.1 Process Description**

The boiler provides steam to the plant. The process steam is used principally for potato peeling, blanching, drying and frying. Boiler No. 1 is a Combustion Engineering Boiler, Model No. 26-A-15 rated at 180 MMBtu/hr. There are no emission controls on the boiler.

***Emissions Limits*****5.2 Emissions Limits**

The particulate matter (PM) emissions shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen when natural gas is combusted or 0.050 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen when diesel or cooking oil is combusted, as required in IDAPA 58.01.01.675.

[IDAPA 58.01.01.675]

5.3 Emissions from Boiler No. 1 shall not exceed any limits listed in the appendices of this permit.

5.4 In accordance with 40 CFR 60.44b, NO<sub>x</sub> emissions from boiler No. 1 shall be less than 0.2 pounds per million British thermal units (lb/MMBtu) (expressed as nitrogen dioxide) as measured by a continuous emissions monitoring system (CEMS).

[40 CFR 60.44b]

5.5 The requirements of 40 CFR 60 Subpart A and Subpart Db shall not be in effect until the boiler is operated above 100 MMBTU/hr.

***Operating Requirements*****5.6 Fuel Specification**

Boiler #1 shall burn natural gas, 0.05% sulfur diesel, or cooking oil exclusively.

***Monitoring And Recordkeeping Requirements*****5.7 Operation Parameters Monitors**

The permittee shall record the following parameters to verify compliance with this permit. The records shall be kept at the facility for the most recent five-year period and shall be made available to Department representatives upon request.



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**5.8 NO<sub>x</sub> Monitoring**

The permittee shall fully comply with all monitoring requirements established by 40 CFR §60 Subpart A – *General Provisions* and Subpart Db – *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units* (40 CFR 60.40b). In particular, the permittee shall install, certify, operate, and maintain, in accordance with all the requirements of 40 CFR 60.48b, a NO<sub>x</sub> CEMS with an automated data acquisition and handling system for measuring and recording NO<sub>x</sub> concentration (in parts per million) and NO<sub>x</sub> emission rate (in lb/MMBtu) from the boiler stack.

[40 CFR 60.40b, 40 CFR 60.48b, 40 CFR Subpart A, 40 CFR Subpart Db]

The permittee shall fully comply with all applicable record keeping requirements set forth in 40 CFR §60, Subpart Db. All such records shall be made available for inspection to Department representatives upon request.

[40 CFR Subpart Db]

**Reporting Requirements**

**5.9 Test Protocols for NO<sub>x</sub> CEMS Certification/Recertification Tests**

The permittee shall submit a test protocol for Department approval for each certification and recertification test of the NO<sub>x</sub> CEMS required in Permit Condition 5.8. Each test protocol shall be submitted to the Department for approval at least 15 days prior to the respective test date.

**5.10 Required NO<sub>x</sub> CEMS Information**

The permittee shall fully comply with the reporting requirements set forth in 40 CFR 60, Subpart Db. In accordance with 40 CFR 60.49b, copies of all certification or recertification notifications, certification or recertification applications, and monitoring plans shall be submitted to the Department.

[40 CFR 60, Subpart Db, 40 CFR 60.49b]

Furthermore, the permittee shall submit to the Department a written report (including all raw field data, etc.) for each certification or recertification test required by Permit Condition 5.7. Each report shall be submitted to the Department within 30 days of the date on which the respective test was completed.

**5.11 Quality Assurance Procedures**

The permittee shall follow quality assurance (QA) procedures in accordance with 40 CFR 60 Appendix F and submit the QA results to the Department for approval within 30 days after the test date.

[40 CFR 60 Appendix F]

The permittee shall submit a written notification of the QA tests to the Department within 30 days prior to performing each respective test.

**5.12 Excess NO<sub>x</sub> Emissions**

The permittee shall submit to the Department copies of all excess emissions and monitoring systems performance reports and/or summary reports for the NO<sub>x</sub> CEMS. The reporting requirements and report format shall be the same as those specified in 40 CFR §60.7(b) through (d) and IDAPA 58.01.01.131. For NO<sub>x</sub> emissions from the boiler stack, periods of excess emissions are any and all 24-hour rolling average NO<sub>x</sub> concentrations as measured by the NO<sub>x</sub> CEMS, which exceed the allowable NO<sub>x</sub> concentration given in Permit Condition 5.3.

[40 CFR 60.7(b) through (d), IDAPA 58.01.01.131]

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**6. BOILER NO. 2 (MURRAY TRANE) AND BOILER NO. 3 (CLEAVER-BROOKS)****6.1 Process Description**

The boilers provides steam to the plant. The process steam is used principally for potato peeling, blanching, drying and frying. Boiler No. 2 is a Murray Trane Boiler Model No. MCF4-57, rated at 72 MMBtu/hr. Boiler No. 3 is a Cleaver Brooks Model No. D-52 rated at 36 MMBtu/hr. There are no emission controls on either boiler.

***Emissions Limits*****6.2 Emissions Limits**

The particulate matter (PM) emissions shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen when natural gas is combusted or 0.050 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen when diesel or cooking oil is combusted, as required in IDAPA 58.01.01.675.

[IDAPA 58.01.01.675]

6.3 Emissions from Boiler No. 2 and Boiler No. 3 shall not exceed any limits listed the appendices of this permit.

***Operating Requirements*****6.4 Fuel Specification**

Boiler No. 2 and boiler No. 3 shall burn natural gas, 0.05% sulfur diesel, or cooking oil exclusively.

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## 7. HEATERS AND BURNERS

### *Emissions Limits*

#### 7.1 Emissions Limits

The particulate matter (PM) emissions shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen when natural gas is combusted, as required in IDAPA 58.01.01.675.

[IDAPA 58.01.01.675]

7.2 Emissions from the heaters and burners shall not exceed any limits listed in the appendices of this permit.

### *Operating Requirements*

#### 7.3 Fuel Specification

The heaters and burners shall burn natural gas exclusively.

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## 8. EMERGENCY DIESEL GENERATORS (100 KW AND 230 KW)

### *Emissions Limits*

#### 8.1 Emissions Limits

Particulate matter emissions shall not exceed 0.05 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen by volume when diesel fuel is combusted, as required in IDAPA 58.01.01.675.

[IDAPA 58.01.01.675]

8.2 Emissions from the emergency diesel generators shall not exceed any of the limits listed in the appendices of this permit.

### *Operating Requirements*

#### 8.3 Hours of Operation

The maximum hours of operation for each emergency diesel generator shall not exceed 8.5 hours per day, except for emergency. The total number of hours of operation for each emergency diesel generator shall not exceed 500 hours per any consecutive 12-month period.

#### 8.4 Fuel Specification

The diesel emergency generators shall be fired exclusively by No. 2 diesel fuel. The sulfur content shall be less than 0.5 weight percent, as required in IDAPA 58.01.01.728.

[IDAPA 58.01.01.728]

#### 8.5 Maintenance and Operating Requirements

The permittee shall maintain and operate the emergency diesel generators in accordance with manufacturer recommendations.

### *Monitoring And Recordkeeping Requirements*

#### 8.6 Emergency Generator Operations

The permittee shall monitor and record the date and number of hours of operation of the emergency diesel generators to verify compliance with Permit Condition 8.3. A compilation of the most recent five years of records shall be kept onsite and shall be made available to Department representatives upon request.

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## 9. WASTE GAS HEATER

### *Emissions Limits*

#### 9.1 Emissions Limits

The PM emissions shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen by volume when waste gas or natural gas is combusted as required in IDAPA 58.01.01.675.

[IDAPA 58.01.01.675]

9.2 Emissions from the waste gas heater shall not exceed any limits listed in the appendices of this permit.

### *Operating Requirements*

#### 9.3 Fuel Specification

The waste gas heater shall burn waste gas or natural gas exclusively.

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## 10. APPENDIX

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### Hourly (lb/hr<sup>1</sup>) and Annual (T/yr<sup>2</sup>) Emission Limits<sup>3</sup>

EMISSION UNIT	PM <sub>10</sub> <sup>4</sup>		SO <sub>2</sub> <sup>5,6</sup>		VOC <sup>6</sup>		NO <sub>x</sub> <sup>7,8</sup>	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Line 1 fryer	2.36	10.33				3.31		
Line 2 fryer	2.18	9.53				3.05		
Line 4 fryer	3.08	13.49				4.32		
Special products fryer	0.44	1.93				0.61		
Line 1 dryer	1.38	6.05						3.25
Line 2 dryer and Pre-dryer	1.37	5.75						3.00
Line 4 dryer	1.80	7.90						4.59
Special products dryer	0.25	1.12						0.74
Boiler #1	3.02	11.39		35.15				99.00
Boiler #2	1.21	5.29		16.34				60.65
Boiler #3	0.60	2.65		8.17				30.32
Waste Gas Heater	0.16	0.74		89.97				9.72
Heaters and burners								3.75
Emergency diesel Generators	0.87	0.22						3.73
<b>Total Facility</b>				<b>99.00</b>				<b>99.00</b>

<sup>1</sup> Pounds per hour

<sup>2</sup> Tons per year

<sup>3</sup> As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or the Department's emission estimation methods used in the permit application analysis.

<sup>4</sup> Particulate matter with an aerodynamic diameter less than or equal to a nominal ten microns

<sup>5</sup> Sulfur dioxide

<sup>6</sup> Volatile organic compound

<sup>7</sup> Nitrogen oxides

<sup>8</sup> Sulfur dioxide (SO<sub>2</sub>) emissions from the waste gas heater shall not exceed 89.96 T/yr. To maintain synthetic minor status the combined SO<sub>2</sub> emissions from the waste gas heater and the rest of the facility shall not exceed 99.00 T/yr.

<sup>9</sup> To maintain synthetic minor status the combined NO<sub>x</sub> emissions from boiler No. 1 and the rest of the facility shall not exceed 99 T/yr.

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## 11. TIER II PERMIT GENERAL PROVISIONS

- 11.1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- 11.2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 11.3. The permittee shall allow the director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the director.
- 11.4. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- 11.5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 11.6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the director.
- 11.7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the director's request shall cause the permit to be voided.
- 11.8. The director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 11.9. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 083-00062****Permittee: Lamb Weston, Inc.****Date Issued: MAY 24, 2002****Location: Twin Falls, Idaho****Date Expires: MAY 24, 2007**

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

- 11.10 The provisions of this permit are severable; if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.